

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

OCT 15 2014

David J. Bradley, Clerk

United States of America

v.

1. Rosa Elena IBARRA YOB: 1985 USC

2. Javier Alonzo ANGEL-Alonzo YOB: 1987

Hondurew

Case No. M-14-2006-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 14, 2014 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

8USC1324(a)(1)(A)(iii)

8USC1324(a)(1)(A)(v)(I)

## Offense Description

knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, conceals, harbors, or shields from detection, or attempts to conceal, harbor, or shield from detection, such alien in any place, including any building or any means of transportation;

engages in any conspiracy to commit any of the preceding acts

This criminal complaint is based on these facts:

On October 14, 2014, US Homeland Security Investigations (HSI) McAllen, Texas received information that led to a stash house in McAllen, Texas, where aliens were believed to be held. During a consent search of this stash house, three undocumented aliens were found.

(Please see Attachment "A")

✓ Continued on the attached sheet.



Complainant's signature

Christopher St. John, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

October 15, 20144:27pm

Judge's signature

City and state: McAllen, Texas

Peter E Ormsby, U.S. Magistrate Judge

Printed name and title

**Attachment A**

Material Witness Jose Oscar ORELLANA-Avelar, a citizen and national of Honduras, was shown a photo lineup and positively identified Javier Alonzo ANGEL-Alonzo as the man who picked him up from the brush and transported him to the stash house. ORELLANA stated ANGEL walked him to the residence and instructed him to get into a laundry room and left him there. ORELLANA was shown a photo lineup and positively identified Rosa Elena IBARRA as the caretaker of the residence where he was harbored at. ORELLANA stated IBARRA provided him with food and shelter at IBARRA's residence.

Material Witness Oscar Amilcar ASECIO-Ruiz, a citizen and national of El Salvador, was shown a photo lineup and positively identified Javier Alonzo ANGEL-Alonzo as the man who picked him up from another house and transported him to the house where he was apprehended at. ASECIO was shown a photo lineup and positively identified IBARRA as the caretaker of the residence where he was harbored at. ASECIO stated IBARRA provided him food and shelter at IBARRA's residence. ASECIO stated IBARRA instructed him to go into the laundry room and was the only person who would let him leave the room in order to shower and use the restroom.

Javier Alonzo ANGEL-Alonzo, a citizen and national of Honduras, stated he was harboring three undocumented aliens at his wife's apartment. ANGEL stated he was called by another smuggler and told to pick up the three aliens near a car wash. ANGEL stated he picked up the three aliens and transported them to his wife's apartment in McAllen, Texas. ANGEL stated he was going to be paid \$25 a night per person for harboring them and \$80 per person to transport them further north. ANGEL stated the three aliens had been at his wife's apartment for approximately two to three days.

Rosa Elena IBARRA, a United States Citizen, stated she leased the apartment where the aliens were apprehended at and that she knew the aliens were there. IBARRA stated \$300 was deposited into her bank account to feed the aliens and that she was aware ANGEL was being paid

\$25 a day per person to house them and \$80 per person to transport them.